

# EXHIBIT 4

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN FRANCISCO - UNLIMITED JURISDICTION

IN RE: : CASE NO. CJC-21-005188  
UBER RIDESHARE CASES :  
:  
:

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: : CASE NO. 3:23-md-03084-CRB  
UBER TECHNOLOGIES, INC, :  
PASSENGER SEXUAL ASSAULT :  
LITIGATION :

\*\*\*HIGHLY CONFIDENTIAL UNDER PROTECTIVE ORDER\*\*\*

VIDEOTAPED DEPOSITION OF HENRY (GUS) FULDNER

SAN FRANCISCO, CALIFORNIA

THURSDAY, MARCH 27, 2025

REPORTED BY:

DEBBIE LEONARD, CSR, RDR, CRR

CSR NO. 14350

PAGES 278 to 594

1 BY MS. LONDON:

02:17

2 Q But you -- as head of safety, you determined

02:17

3 that was insufficient, that you actually needed to go

02:17

4 launch a program to ensure mandatory training and

02:17

5 education, right? That was an initiative that you led in

02:17

6 2020, right?

02:17

7 MR. LUSKEY: Object to form. Compound. It's

02:17

8 three questions.

02:17

9 BY MS. LONDON:

02:17

10 Q I'll ask it again.

02:17

11 You determined personally that the sharing of

02:17

12 the community guidelines, a process you just discussed,

02:17

13 that was insufficient to provide training and education

02:17

14 to your drivers? You decided that, right?

02:17

15 MR. LUSKEY: Object to form.

02:17

16 THE WITNESS: I directed the team to invest in

02:18

17 more and -- a more extensive education, which we -- which

02:18

18 the team built and rolled out.

02:18

19 BY MS. LONDON:

02:18

20 Q And the team --

02:18

21 A And I think the ultimate product that they

02:18

22 produced is of high quality and is meaningful substantive

02:18

23 education.

02:18

24 Q And Uber does not mandate that in all states; in

02:18

25 some states, it does not mandate that, correct?

02:18

1 MR. LUSKEY: Object to form. 02:18

2 THE WITNESS: The -- it is mandated in almost 02:18

3 all states. I don't know the -- with certainty every -- 02:18

4 every last state. 02:18

5 BY MS. LONDON: 02:18

6 Q And the reason Uber doesn't require it in 02:18

7 certain states is because that could impact Uber's 02:18

8 business model with respect to independent contractors, 02:18

9 correct? 02:19

10 MR. LUSKEY: Object to form. Assumes facts. 02:19

11 Vague. 02:19

12 THE WITNESS: Over time, there have been a 02:19

13 variety of different -- different factors that we have to 02:19

14 consider in training, including whether or not we -- 02:19

15 whether or not and how we pay drivers for time that they 02:19

16 do training. And so there's been some state-specific 02:19

17 details there in places where it is -- so in some places, 02:19

18 we operate under a payment model where we pay drivers for 02:19

19 completing the training. 02:19

20 BY MS. LONDON: 02:19

21 Q Okay. But I just want to get it clear for the 02:19

22 record. 02:19

23 Is it your testimony that Uber's business model 02:19

24 with respect to maintaining independent contractor 02:19

25 status, that does not have any impact on Uber's decision 02:19

1 C E R T I F I C A T E

2

3 I, Debbie Leonard, Certified Shorthand Reporter  
4 No. 14350 for the State of California, do hereby  
5 certify:

6 That the foregoing deposition was taken before me  
7 at the time and place therein set forth, at which time  
8 the witness was put under oath by me; that the testimony  
9 of the witness and all objections made at the time of the  
10 examination were recorded stenographically by me, were  
11 thereafter transcribed by me by means of computer; and  
12 that the foregoing is a true record of same.

13 I further certify that I am neither counsel for  
14 nor related to any party to said action, nor in any way  
15 interested in the outcome thereof.

16 IN WITNESS WHEREOF, I have subscribed my name  
17 this 8th day of April, 2025.

18

19



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Debbie Leonard, CSR, RDR, CRR  
CSR NO. 14350

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